

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC.,¹

Debtor.

Chapter 11

Case No. 25-10068 (CTG)

Re: Docket No. _____

**CONSENT ORDER APPROVING JOINT STIPULATION REGARDING
CLAIMS OF BAYSHORE VILLAGE (US), INC.**

Pursuant to and in accordance with the *Joint Stipulation Regarding Pending Claims* (the “Stipulation”)² attached hereto as **Exhibit 1**, and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief set forth herein is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and with the consent of the Parties; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor's mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Stipulation.

1. The Stipulation is hereby approved and the terms of the Stipulation are hereby made effective by this Consent Order.

2. Sufficient notice of this Consent Order has been provided and the requirements of Rule 3007 of the Federal Rules of Bankruptcy Procedure and any applicable local rules of this Court are otherwise satisfied.

3. Notwithstanding any applicable rules to the contrary, this Consent Order shall be immediately binding and enforceable upon its entry.

4. The Debtors and the Plan Administrator are authorized to take all actions necessary to effectuate the relief granted in this Consent Order.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Consent Order.

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC.,¹

Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

**JOINT STIPULATION REGARDING
CLAIMS OF BAYSHORE VILLAGE (US), INC.**

Ann Aber, the Plan Administrator, for and on behalf of the Debtors (collectively, “Debtors”), Bayshore Village (US), Inc. (“Landlord” and together with the Debtors, collectively, the “Parties”), by and through their undersigned counsel, hereby enter into this stipulation (this “Stipulation”) as to the following:

1. The Landlord’s lease was terminated.
2. On or about February 12, 2025, Landlord filed a Proof of Claim designated as Claim 423. Claim 423 asserts claims totaling \$49,752.02, including administrative expense claims totaling \$13,060.84.
3. The administrative expense claim portion of Claim 423 has been paid in part, as Landlord acknowledges the receipt of \$5,307.73 subsequent to the filing of Claim 423 against its administrative rent claim, leaving an administrative claim which is comprised in part of claims that are valid as an administrative expense and in part general unsecured claims.
4. Debtors and the Landlord hereby agree to resolve the administrative claims set forth in Claim 423 by the payment of \$2,424.46, and further agree that upon Landlord’s receipt of such

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payment the administrative expense claims set forth in Claim 423 shall be deemed withdrawn with prejudice as administrative expense claims, and such claims, totaling \$5,328.65, shall be deemed re-classified in their entirety as a general unsecured claim.

5. Nothing contained herein constitutes the allowance of any unsecured claim of Landlord.

STIPULATED and AGREED this 15th day of December, 2025:

Dated: December 15, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

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